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# EXHIBIT V

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

JANE ROE, individually and on behalf of all others similarly	) Case No.: 1:12-cv-02288-JG
situated,	) Judge James S. Gwin
Plaintiff,	) Magistrate Judge Greg White
<b>v.</b>	) ) INTELLICORP RECORDS, INC.'S
INTELLICORP RECORDS, INC., an Ohio corporation,	) DESIGNATION OF EXPERTS
Defendant.	) ) )

Defendant Intellicorp Records, Inc. ("Intellicorp") hereby identifies the following individuals as expert witnesses:

# 1. <u>Arnold Barnett</u>:

Professor Barnett is the George Eastman Professor of Management Science and Professor of Statistics at the Sloan School of Management at the Massachusetts Institute of Technology ("MIT"). He is an expert in the field of statistics and his research interests include applied statistics and modeling. Intellicorp anticipates that Professor Barnett may provide testimony regarding statistical analyses of the putative class, including statistical sampling and modeling, as well as rebuttal testimony regarding any opinions offered by Plaintiffs' expert witnesses.

#### 2. Anne Fortney:

Ms. Fortney is the former Associate Director for Credit Practices at the Federal Trade Commission's Bureau of Consumer Protection. She is presently a partner at the law firm of Hudson Cook, LLP, which is located at 1020 19th Street, NW, 7th Floor, Washington, DC 20036. Her practice focuses on consumer financial services, including privacy and data security. She is an expert in the consumer reporting industry, including the background screening process. Intellicorp anticipates that Ms. Fortney may provide testimony regarding the background check industry, including employment screening reports, and the FCRA, as well as rebuttal testimony regarding any opinions offered by Plaintiffs' expert witnesses.

# 3. Stuart Madnick

Professor Madnick is the John Norris Maguire Professor of Information Technology at the MIT Sloan School of Management, as well as a Professor of Engineering Systems at the MIT School of Engineering. He is an expert in databases and information technology. Intellicorp anticipates that Professor Madnick may provide testimony regarding issues relating to Intellicorp's databases, including the feasibility of using any such databases to identify putative class members, as well as rebuttal testimony regarding any opinions offered by Plaintiffs' expert witnesses.

Intellicorp reserves the right to call additional expert witnesses for rebuttal or to address future developments.

Date: January 28, 2013

# Respectfully submitted,

/s/

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#### CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2013, a true and accurate copy of the foregoing was served via e-mail upon the following:

Nance F. Becker Christian Schreiber Chavez & Gertler LLP 42 Miller Ave. Mill Valley, CA 94941 Counsel for Plaintiff

Joshua E. Kim A New Way Of Life Reentry Project 958 E. 108th Street Los Angeles, CA 90059 Counsel for Plaintiff Devin H. Fok The Law Offices of Devin H. Fok P.O. Box 7165 Alhambra, CA 91802-7165 Counsel for Plaintiff

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